

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE**

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In re: DENNIS WAYNE KING  
Debtor / Plaintiff

vs.  
CALIBER HOME LOANS, INC.  
Creditor / Defendant

Case No. 19-23840 PJD  
Chapter 13  
Adv. Pro. No.

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**COMPLAINT FOR INJUNCTIVE RELIEF**

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Comes now the Debtor/Plaintiff, by and through attorney of record, and in support of this Complaint for Injunctive Relief states:

1. That jurisdiction and venue are proper.
2. That the Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on May 15, 2019.
3. That the Debtor included Caliber Home Loans, Inc. (hereinafter sometimes referred to as "Defendant") in his original petition as a secured creditor, holding a deed of trust on his real property located at 1682 West Holmes Road, Memphis, Tennessee 38109.
4. That said real property is the Debtor's principal residence and is essential to the Debtor's successful reorganization under this plan.
5. That the real property is scheduled for a foreclosure sale on Thursday, May 30, 2019.
6. That the Debtor filed a Motion to Impose Automatic Stay on May 15, 2019 but the matter is not set to be heard by this court until June 4, 2019, five days after the scheduled sale date.
7. That it would be an injustice and the Debtor would suffer irreparable harm and injury if an order is not issued preventing Defendant from selling, transferring, or foreclosing on the aforementioned real property until a final hearing is held on the Debtor's Motion to Impose Automatic Stay. That the potential harm suffered by Defendant in being at least temporarily enjoined from selling, transferring or foreclosing on the aforementioned real property is minute compared to the potential harm that the Debtor would suffer if the relief he is seeking in this Complaint is not granted.
8. That the Debtor requests that the Defendant be enjoined from selling, transferring or foreclosing on his real property located at 1682 West Holmes Road, Memphis, Tennessee 38109.

WHEREFORE, PREMISES CONSIDERED, the Debtor prays that this matter be set for a hearing and that the Court enter an order for an injunction prohibiting the foreclosure, sale, or transfer of the subject real property.

Respectfully Submitted,

/s/ Herbert Hurst

Herbert Hurst (18721)

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